Federal Communications Commission Attn: Marlene H. Dortch, Secretary Office of the Secretary 445 12<sup>th</sup> Street, SW, Suite TW-A325 Washington, DC 20554

Re: EB Docket 06-36

Dear Ms. Dortch:

Per FCC's request, please find the enclosed annual CPNI certification for 2010. Let us know if you need anything else for this filing.

The undersigned, as an officer of Accutel of Texas, L.P., certifies that Accutel of Texas, L.P., is in compliance with Section 64.2009 of the Commission's rules.

Sincerely,

Peni Barfield, CEO Accutel of Texas, L.P.

cc: Best Copy and Printing, Inc., 445 12<sup>th</sup> Street, Suite CY-B402, Washington, DC 20554, 202-488-5300 fax 202-488-5563

Via e-mail: FCC@BCPIWEB.com

Annual 64.2009(e) CPNI Certification for 2010

Date Filed: 1/21/2011

Name of Company covered by this certification: Accutel of Texas, L.P.

Form Filer ID: 824292

Name of signatory: Peni Barfield

Title of signatory: CEO

## Certification of CPNI Filing Accutel of Texas, L.P.

I, Peni Barfield, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established CPNI operating procedures that are adequate to ensure compliance with Commission's CPNI rules. See 47 C.F.R. S: 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

Accutel of Texas, L.P. does not use CPNI when conducting outbound marketing. Customers' CPNI is not disclosed to third parties without prior approval of the customers. When services are marketed to customers, it is by insert with monthly bills. Any Accutel employee who discloses CPNI in violation of FCC rules is subject to disciplinary action and possible termination.

Accutel of Texas, L.P. has not taken any actions against data brokers in the past year.

Accutel of Texas. L.P. has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Accutel of Texas, L.P. represents and warrants that the above certification is consistent with 47. C.F.R. S: 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Peni Barfield, CEO Accutel of Texas L.P.

Dated: January 21, 2011

## Accutel of Texas, L.P.

## CUSTOMER PROPRIETARY NETWORK INFORMATION ("CPNI") PROCEDURES

The operating procedures of Accutel of Texas. L.P. are designed to ensure compliance with the CPNI rules applicable to telecommunications carriers. These procedures are designed to meet Accutel's duty to protect CPNI from any disclosure or use that is not permitted by the rules of the Federal Communications Commission.

- A. All disclosures or uses of Customer Proprietary Network Information ("CPNI") are to be approved by the customer except for valid law enforcement requests. Lacking customer approval, any request to utilize CPNI requires approval of the Manager to determine validity.
- B. All disclosures of CPNI for law enforcement will be listed in the CPNI notebook/file along with backup documentation maintained by the designee of the Manager. Accutel does not disclose CPNI to third parties to be used for marketing purposes.
- C. All outbound marketing request campaigns need to be approved by the Manager. Such approval will require use of lists of customers showing the opt-in or opt-out approvals including history of notices to customers.
- D. In instances of Opt-out mechanisms that do not work properly, the Manager, and/or CFO are required to notify the FCC within five (5) business days in writing. The notice shall be in the form of a letter, and shall include the carrier's name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when it will be/was implemented, whether the relevant state commission(s) has been notified and whether the state commission(s) has taken any action, a copy of the notice provided to customers, and contact information. Such notice must be submitted even if the carrier offers other methods by which customers may opt-out.
- E. Employees will be educated on the company's policy not to improperly disclose or use CPNI.
- F. A corporate officer acting as agent for the Company will certify on an annual basis stating that the officer has personal knowledge that the Company has established the above operating procedures and that these procedures are adequate to ensure compliance with applicable CPNI rules.